

# **EXHIBIT 13**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**In re: Methyl Tertiary Butyl Ether  
("MTBE") Products Liability Litigation**

**This document relates to:**

*New Jersey Department of Environmental  
Protection v. Atlantic Richfield Co., et al, No.  
08 Civ. 00312*

Master File No. 1:00-1898  
MDL 1358 (SAS): M21-88

AMENDED: 8/14/12  
Response to Citgo Petroleum Corp's first  
set of Interrogatories and second set of  
requests for production of documents served  
upon third party defendant Robert Melecci  
dated June 15, 2012

**All documents were previously been produced in their entirety March 12, 2012**

1. Robert Melecci has owned the property at 439 Lake Avenue, Colonia, New Jersey since February 4, 1983.
2. February 4, 1983 to the present
3. Rob's Service Center, 1983 to 1987 and 1989 to November 2003
4. Rob's Service Center, 1983 to 1997
5. Lino Silva owned the property and operated the business prior to 1983. No knowledge when Mr. Silva purchased the property. Robert Melecci owned the service station portion until 2003 when H.P. Delta began operating the gasoline service with their own pumps.
6. Robert Melecci from 1983 to 1987 and 1989 until November 2003.
7. Robert Melecci from 1983 to the present
8. Robert Melecci from 1983 until 1997; vacant from 1997 until approximately 2000; Absolute Auto Repair from approximately 2000-2001; A&J Auto Repair from approximately 2001 – 2003; vacant from 2003 until 2007; Junior's Complete Car Care from 2007 to present
9. I purchased 5 double wall UST's in November 1988 and they were installed in winter 1989
10. Prior to 1987, Getty owned the tanks